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AFFIDAVIT IN SUPPORT OF A CRIMINAL COMPLAINT

I, Timothy E. Edquist, also referred to hereafter as “Affiant,” being first duly sworn according to law, hereby depose and state:

INTRODUCTION AND AGENT BACKGROUND

1. I am a Special Agent of the Federal Bureau of Investigation (FBI), United States Department of Justice, hereinafter referred to as Affiant, being duly sworn under oath, hereby deposes and states as follows:

2. I am a Special Agent with the Federal Bureau of Investigation (FBI), United States Department of Justice. I have been employed by the FBI since 2008 and have been a law enforcement officer since February of 2013. I am currently assigned to the FBI’s Cleveland Division’s Akron Resident Agency (RA), where I primarily investigate a variety of criminal matters involving violations of Federal laws. Additionally, I regularly work with members of the FBI’s Greater Akron Area Safe Streets Task Force. I have gained experience through training at the FBI Academy in Quantico Virginia, a variety of on-the-job training seminars, and from everyday work relating to conducting investigation like the one described herein. While employed by the FBI, I have investigated wire fraud, bank fraud, identity theft, extortion, cyberstalking, computer intrusions, bank robberies, drug trafficking organizations, violent criminal street gangs, crimes against children, money laundering, kidnapping, and other federal offenses.

3. As part of my duties as a FBI Special Agent, I investigate various federal violations and crimes including, but not limited to, conspiracies involving wire fraud and other fraudulent criminal acts in violation of federal law. I have been trained in various aspects of law

enforcement, including the investigation of fraud and fraud related conspiracies. Through my education and experience, and that of other agents assisting in this investigation, I have become familiar with the methods that individuals use to defraud unsuspecting victims in what are identified as Government Agent Impersonation scams, or schemes where criminal actors convince, or attempt to convince, victims that their personal information and/or financial accounts have been compromised and/or have been used to commit criminal activities. The criminal actors often utilize intimidation tactics to gain cooperation from the victim, and they threaten to confiscate the victim's property, freeze their bank accounts, and/or have the victims arrested unless payment is made immediately. The criminal actors often direct victims to transfer large or small sums of the victim's funds via wire transfers, via commercial shipping parcels, via in-person cash transactions, and/or via other means. Through these investigations as well as my previous training, I have become familiar with the patterns of activity regarding wire fraud suspects as well as the methods they employ to plan, coordinate, and conduct the schemes and defraud victims.

4. I am submitting this affidavit in support of an Application for a Criminal Complaint and Arrest Warrant pursuant to Federal Rule of Criminal Procedure 41 and 18 U.S.C. 3052, authorizing the arrest of **TARAS SEMUSO**, date of birth XX/XX/1989 (hereinafter "**SEMUSO**").

5. The facts contained in this affidavit are based upon information provided to me by other law enforcement officers, other witnesses, and my own personal knowledge. Since this affidavit is made for the limited purpose of supporting a Criminal Complaint, I have not set forth each and every fact learned during the course of the investigation. Rather, I have set forth only those facts that I believe are necessary to establish probable cause for the crimes charged. Unless

otherwise indicated, where actions, conversations, and statements of others are related herein, they are related in substance and in part only.

6. Based upon the investigation to date, I assert probable cause exists to believe that on or about the dates July 8, 2022, July 12, 2022, and August 19, 2022, in the Northern District of Ohio, **TARAS SEMUSO** did commit a violation of Title 18 United States Code, Section § 1343, that is Fraud by Wire.

PROBABLE CAUSE

7. In June of 2022, a 52-year-old male from Brunswick, Ohio, (hereinafter identified as the “Victim”) reportedly fell victim to a fraud scheme involving what is commonly described as a Government Agency Impersonation Scam. The Victim recalled initially receiving a text message communication from an entity who the Victim believed was a security representative for Amazon.com. The message detailed potential fraud related to the Victim’s account and referred the Victim to further communicate with a representative. The victim was then referred to communicate with subject who the Victim described as an unidentified male who spoke English with a slight accent (hereinafter “Unidentified Subject #1”).¹ At some point during their initial communications, Unidentified Subject #1 impersonated a Federal Agent from an identified United States Government Agency when Unidentified Subject #1 informed the Victim that Unidentified Subject #1 was an employee of said agency. Unidentified Subject #1 reportedly sent the Victim an image of the credentials of a fictitious Federal Agent. Further, Unidentified Subject #1 falsely implied that the Victim’s personal funds were to be seized by the U.S. Government due to suspicious financial activity detected on the Victim’s financial accounts. Unidentified

¹ **SEMUSO** was later determined to be a co-conspirators of Unidentified Subject #1

Subject #1 informed the Victim that his personal information and financial accounts were compromised and had been used by criminals in fraud schemes and had been specifically detected in a narcotics trafficking conspiracy investigation. The Victim reported that statements made by Unidentified Subject #1 about the Victim's particular financial circumstances, led the Victim to unsuspectingly believe Unidentified Subject #1's false storyline from onset of the scheme. The Victim reported that between June of 2022 and August of 2022, he communicated with Unidentified Subject #1 via telephone call and text message communications

8. The Victim reported Unidentified Subject #1 instructed him to withdraw large quantities of U.S. currency from the Victim's bank accounts and initially transfer the cash to Unidentified Subject #1 by sending via a commercial shipping carrier parcel. Later, Unidentified Subject #1 instructed the Victim to transfer cash via a money courier dispatched by Unidentified Subject #1. Unidentified Subject #1 informed the Victim that the purpose of the transfers of the Victim's money was for safe keeping by the U.S. Department of Treasury.

9. On or about June 28, 2022, Unidentified Subject #1 directed the Victim to package and send approximately \$8,700.00 of the victim's personal funds to an identified address in California via a shipment using an identified commercial shipping carrier. Unidentified Subject #1 instructed the Victim to package the cash into a small cardboard box and complete the transfer by sending the box via the identified commercial shipping carrier.

10. On or about July 8, 2022, Unidentified Subject #1 directed the Victim to withdraw a large amount of cash from his bank account for the purpose of transferring the cash to a courier (later identified as **SEMUSO**) to be dispatched by Unidentified Subject #1. The Victim was instructed to package approximately \$75,000.00 inside of a cardboard box and deliver the box to a courier (**SEMUSO**) at a Walmart store in Medina Township, Ohio. The

Victim reportedly provided the cardboard box containing the money to the courier (**SEMUSO**) who walked up to the Victim's vehicle on foot while the Victim was parked in the Walmart store parking lot. The Victim described the courier as a white male, wearing shorts and carrying a messenger style bag with an airplane neck brace attached to the bag.

11. On or about July 12, 2022, Unidentified Subject #1 again directed the Victim to withdraw a large amount of cash from his bank account for another in-person delivery to a courier (**SEMUSO**) dispatched by Unidentified Subject #1. On this occasion, the Victim was instructed to package approximately \$126,000.00 of the Victim's funds inside of a cardboard box and deliver the box to a courier (**SEMUSO**) at the same Walmart store in Medina Township, Ohio. The Victim reportedly provided the cardboard box containing the money to the courier (**SEMUSO**) who again walked up to the Victim's vehicle on foot while the Victim was parked in the Walmart store parking lot.

12. The Victim informed investigators he delivered both cardboard boxes containing his money to the same courier (**SEMUSO**) during the July 8, 2022, and July 12, 2022, money transfer incidents. During both encounters with the courier, the Victim was instructed to accept a \$50 bill and \$100 bill, respectively, from the courier (**SEMUSO**) prior to passing over the cardboard boxes of money. The Victim was instructed to then capture images of the serial numbers on the \$50 bill and \$100 bills and send the images to Unidentified Subject #1 for the purpose of validating money transfers to the courier (**SEMUSO**).² The Victim advised investigators that he also added handfuls of candy suckers inside the boxes packed with his

² The capturing of a digital image of a U.S. currency bill and sending the image to a third-party handler is a common tactic of narcotics traffickers, money launderers, and other criminal elements. This tactic allows couriers or traffickers who have never met or interacted previously to verify the identities and roles of the couriers or traffickers for a respective mutual transfer of either currency or some sort of contraband.

money. The Victim described candies as a traditional sucker style, in varying colors, with an attached paper stick handle, and contained in transparent plastic wrappings with his bank's name and logo on the packaging. The Victim stated he grabbed handfuls of the free candies from the bank when he was making the large cash withdrawals from various bank branches.

13. The Victim reported receiving a text message from Unidentified Subject #1 several days following the July 12, 2022, money transfer event. Attached to the text message sent by Unidentified Subject #1 was an image of a brown paper bag with approximately 15 of the same candies supplied by the Victim inside of the cardboard box containing the Victim's cash. The Victim believed Unidentified Subject #1 sent the image to the Victim for the purpose of informing the Victim that the money was received by the Unidentified Subject #1's money courier.

14. When he contacted the FBI on or about August 16, 2022, reference the fraudulent incidents, the Victim informed investigators that he was well aware that he was the victim of the fraud scheme. The Victim stated he was still being telephonically contacted by Unidentified Subject #1 daily, and that Unidentified Subject #1 continued to insist that the Victim make another transfer of his cash for safe keeping. Specifically, during a series of communications in August of 2022, Unidentified Subject #1 attempted to convince the Victim to make another cash transfer of an amount of approximately \$115,000.00 to Unidentified Subject #1's courier. More than one telephone call between Unidentified Subject #1 and the Victim was witnessed by investigators. Additionally, the Victim showed investigators various text message communications between Unidentified Subject #1 and the Victim dating back to June of 2022. Further, the Victim provided copies of bank withdrawal receipts and other financial documentation dating back to the early July 2022. Based on a review of documentation provided

by the Victim as well as statements made by other witnesses, investigators determined that the Victim did likely withdraw large sums of his own funds in various amounts of U.S. currency with the intention of preventing his funds from being seized. Nevertheless, the Victim fell, unwittingly, to the Government Agency Impersonation fraud scheme.

15. Based on the observations of investigators of the contemporaneous telephone call and text message communications occurring between Unidentified Subject #1 and the Victim, investigators deemed it likely that Unidentified Subject #1 still presumed the Victim would again facilitate another cash transfer of his own funds. Therefore, investigators believed that a controlled money transfer operation was feasible. The Victim agreed to continue to assist investigators by participating in a controlled money transfer operation involving several law enforcement agencies. The purpose of the controlled money transfer operation was to surveil and attempt to identify the courier dispatched by Unidentified Subject #1.

16. On or about August 18, 2022, investigators attempted to review surveillance video recordings of the interior and exterior areas of the Walmart store for the reported fraud incident dates of July 8, 2022, and July 12, 2022. Investigators observed the courier, later positively identified as **SEMUSO**, meeting with the Victim near the Victim's vehicle in the southwest area of the Walmart store parking lot. Investigator determined the July 8, 2022, encounter involving the Victim and the money courier (**SEMUSO**) occurred at approximately 6:35 p.m. The money courier (**SEMUSO**) was wearing a black trucker style ball cap, jean shorts, a white Calvin Klein brand shirt, sandals, and he also carried a black messenger style bag with an airplane neck brace attached to the bag. The money courier (**SEMUSO**) was observed arriving in silver Hyundai SUV, believed to be an Uber vehicle, approximately 20 minutes prior to meeting with the Victim. After his encounter with the Victim, the money courier (**SEMUSO**) was

observed carrying the small brown cardboard box, reported to contain the cash. The money courier (**SEMUSO**) was observed walking around in the store, shopping for food, water, and other items, and then waiting outside of the store for approximately another half hour. The money courier (**SEMUSO**) was observed entering a blue Toyota Corolla driven by an Uber driver and the Toyota Corolla was observed departing the area of the Walmart store.

Investigators learned that the driver of the Toyota Corolla transported the money courier (**SEMUSO**) to a Motel 6 location in Medina, Ohio.

17. Investigators later confirmed that **SEMUSO** was booked as a paying customer at the Motel 6 for a one-night stay, on or about July 8, 2022.

18. Upon review of surveillance video of the interior and exterior areas of the Walmart store on or about July 12, 2022, investigators observed the money courier (**SEMUSO**) again meeting with the Victim near the Victim's vehicle in the same area of the Walmart store parking lot as the July 8, 2022, encounter. Investigator determined the July 12, 2022, encounter involving the Victim and the money courier (**SEMUSO**) occurred at approximately 9:09 p.m.

19. On or about August 19, 2022, at approximately 9:30 a.m., the Victim falsely informed Unidentified Subject #1 that he finally made a withdrawal from his bank in the amount \$115,000.00. Upon hearing the Victim's fictitious storyline about possessing a large sum of his money, Unidentified Subject #1 proceeded to instruct the Victim to package up the cash inside of a cardboard box in the same manner the Victim had done so during the previous fraudulent incidents. Unidentified Subject #1 then told the Victim to standby and wait for additional instructions regarding the location and time of the meeting with the courier. During one of the telephone calls, Unidentified Subject #1 informed the Victim that he made meeting arrangements with his courier, who Unidentified Subject #1 described as his undercover agent. Unidentified

Subject #1 agreed to direct his courier again to the same Walmart store in Medina Township, Ohio, to pick up the money from the Victim. At some point during their series of communications witnessed by investigators, Unidentified Subject #1 sent the Victim an image of a one-dollar bill via text message. The image depicted the one-dollar bill that was to be provided to the Victim by the money courier (**SEMUSO**) prior to the Victim handing over the money.

20. At approximately 12:30 p.m., investigators observed a subject later positively identified as **SEMUSO** walking around in the parking lot of the Walmart store. It was determined **SEMUSO** had arrived in a Kia Sportage Sport Utility Vehicle (SUV) just moments prior to investigators observing **SEMUSO**. **SEMUSO** parked his rental vehicle in the parking lot of the Kohl's store, just north of the Walmart store, and he walked up the hill to the Walmart store parking lot carrying a black bag. Investigators observed **SEMUSO** walk up near the Victim's vehicle which was parked in the same general location as the July 8, 2022, and July 12, 2022, money transfers incidents. Immediately thereafter, Investigators observed **SEMUSO** appearing to communicate on his cellular telephone. At approximately the same time, Unidentified Subject #1 telephonically contacted the Victim to advise that his courier was presently in the area of the Walmart store.

21. At approximately 12:35 p.m., Officers with the Medina Township Police Department (MTPD) contacted and detained **SEMUSO**. **SEMUSO** was subsequently taken into custody and arrested. **SEMUSO** possessed a Ukrainian passport when he was encountered. During the investigation, it was determined **SEMUSO** was admitted in the United States in April of 2022 and was granted entry under a humanitarian parole status for one year. At the time of his encounter with law enforcement, **SEMUSO** was residing the State of New York. Investigators

believe **SEMUSO** traveled to from New York to Ohio in both July of 2022 and in August of 2022, for the purpose of retrieving money from the Victim.

22. When he was encountered by uniformed MTPD Officers, **SEMUSO** possessed a cellular telephone described as an Apple brand, iPhone Model 8, white in color.

23. On or about August 19, 2022, search warrants for **SEMUSO**'s white Apple iPhone 8 cellular telephone and his rental vehicle were authorized by the Honorable Judge Julie Schafer in the Medina County Court of Common Pleas, in Medina, Ohio. The search warrant for **SEMUSO**'s cellular telephone was executed by investigators shortly thereafter. The search warrant for **SEMUSO**'s rental vehicle was executed by investigators days later.

24. A review of the forensic data report for **SEMUSO**'s white Apple iPhone 8 cellular telephone revealed **SEMUSO**'s specific communications with another co-conspirator (hereinafter "Unidentified Subject #2"). Specifically, in various text message communications, Unidentified Subject #2 appeared to coordinate and direct **SEMUSO** to travel to prearranged locations for money pickups and other activities.

25. Specifically, investigators observed an image file on **SEMUSO**'s cellular telephone of an image captured of a one-dollar bill. According to the metadata for the image file, the image was captured on August 19, 2022, at approximately 11:59 a.m. approximately 30 minutes prior to the controlled money transfer between the Victim to **SEMUSO**, prearranged by Unidentified Subject #1 and Unidentified Subject #2, as well as other potential unidentified subjects.

26. In one of the text message communications, **SEMUSO** attached and sent the image of the one-dollar bill to Unidentified Subject #2, and others. Investigators did confirm that

the image of the one-dollar bill captured and sent by **SEMUSO** was the same image received by the Victim in a text message sent by Unidentified Subject #1. Investigators believed **SEMUSO** captured and sent this image of the one-dollar bill to verify his identity as the true money courier dispatched for the purpose of retrieving the Victim's money for the purpose of perpetuating a fraud scheme.

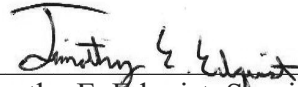
27. Investigators also observed an image file on **SEMUSO**'s cellular telephone of a north facing image of the Kohl's store parking lot, the same general area where **SEMUSO** parked his Kia SUV rental vehicle when he arrived for the purpose of the money pickup on August 19, 2022. According to the metadata for the image file, the image was captured on July 12, 2022, at approximately 9:00 p.m. several minutes prior to the money transfer from the Victim to **SEMUSO**.

28. Investigators also observed an image file on **SEMUSO**'s cellular telephone of a brown paper bag with approximately 15 candy suckers in the bottom of the bag. According to the metadata for the image file, the image was captured on July 12, 2022, at approximately 9:11 p.m. several minutes after the money transfer from the Victim to **SEMUSO**. Investigators believe **SEMUSO** captured an image of the 15 candy suckers in the bottom of the bag and sent the image to Unidentified Subject #2 for the purpose of showing proof to Unidentified Subject #2 that he collected money from the box without actually sending a picture of the money. At some point thereafter, the image of the brown paper bag with the suckers was sent to Unidentified Subject #1 who then forwarded it to the Victim for the same purpose; basically, proving to the Victim that the box was received, and that the money was collected from the box avoiding the necessity of sending an image of the money.

29. For the purpose of executing and attempting to execute this Government Agency Impersonation Scam, the scheme and artifice to defraud described above, **SEMUSO** transmitted and caused to be transmitted by means of wire communication in interstate commerce, writings, signs, signals, pictures, and sounds, to wit:

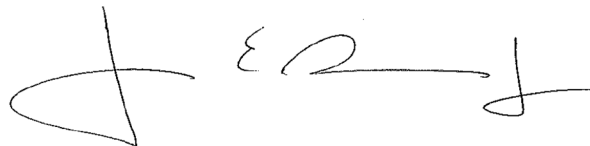
- **SEMUSO** did send an image of a one-dollar bill from his Apple iPhone to Unidentified Subject #2, and others, in order to verify his identity as the true money courier dispatched for the purpose of retrieving the Victim's money in furtherance of a fraud scheme.

30. Based on the foregoing facts, I believe that probable cause exists for the issuance of a complaint and arrest warrant for **SEMUSO**, charging him with Wire Fraud, in violation of Title 18, United States Code Section 1343.



Timothy E. Edquist, Special Agent
Federal Bureau of Investigation
Akron, Ohio

Sworn to via telephone after submission
by reliable electronic means.
Fed. R. Crim. P. 3, 4(d), and 4.1, on
this 10th day of November, 2022.



James E. Grimes Jr., United States Magistrate Judge